## UK Modern Slavery Act Statement

I. Introduction

This statement sets out the actions by UVertz, LLC (the "Company") aimed at taking measures to prevent slavery or human trafficking in its business and supply chain. This statement is made pursuant to Section 54(1) of the Modern Slavery Act of 2015 (the "Act") and constitutes the Company's slavery and human trafficking statement in relation to its actions and activities since the formation of the limited liability company through the date hereof.

II. Organizational Structure and Business

The Company is organized as a Delaware limited liability company and is domiciled in Delaware. The Company maintains its headquarters in Beverly Hills, California. The Company provides consulting and digital marketing services. The company is funded through founder contributions and through an initial seed round of Silicon Valley accelerator Y-Combinator-style SAFEs (Simple Agreements for Future Equity), warrants to purchase stock in a future priced round.

> III. Our Supply Chains

The Company's supply chains include hardware developers, software developers, I.T. and other office equipment, professional services, office cleaning and other office facilities services. We are based in the United States as are the majority of our suppliers. As of the date hereof, our supply chain is low risk and non-complex in structure. As of the date hereof, our presence in the UK is limited. As our presence in the UK is expected increase with Company growth, the Company endeavors to prophylactically comply with the Act.

## Our Policies on Slavery and Human Trafficking

Our position on slavery and human trafficking is clear. We have adopted policies, processes and practices to prevent this within our business operations and supply chains. We continuously look at ways to enhance these processes and we currently are undertaking the following measures:

It is now our policy to require our suppliers to adhere with our supplier code of conduct (the "Code") which amongst other governance and compliance obligations made reference to in the Act, sets out the minimum behaviours, standards and practices we expect to see from our suppliers and amongst other obligations prohibits forced labour, discrimination and child labour, ensures supplier working conditions are safe and that workers are treated with respect and dignity with the aim of preventing slavery and human trafficking taking place anywhere in our supply chains or business operations. The Code is published on our external website and all new suppliers are required to read and acknowledge this as part of the on-boarding process.

Our purchase order terms and conditions and global supplier agreements contain contract terms that require our suppliers and vendors to comply with all applicable law and require compliance with the Act and Code. We comply with all relevant UK employment laws with respect to having internal policies in place to prevent slavery and human trafficking and have included in the employee handbook which is circulated to all employees and covers recruitment, health & safety, harassment, anti-bribery, equal opportunities and diversity. Our employees have access to a confidential whistleblowing process for raising concerns and we continue to increase awareness amongst employees through training on issues relating to slavery and human trafficking so that they may report any concerns as they arise. We have drafted a anti-slavery & human trafficking policy which has been included in the employee handbook, to which all employees have access and which is communicated to all new joiners during the induction process.

We comply with the Global Compact 10 Principles of the United Nations which includes protecting universal human rights and the elimination of all forms of forced and compulsory labour and child labour. We are committed to ensuring that these principles are observed and this is highlighted in the code of conduct, a defined set of internal policies, procedures and processes framework (known as JANUS) which sets out the compliance and governance processes that help to prevent slavery and human trafficking and promote human rights. JANUS is available to all employees.

## V. Risk Assessment and Due Diligence

We have assessed our supply chain for potential areas of increased risk of slavery and human trafficking. As part of our initiative to identify and mitigate the risk of slavery and human trafficking in our supply chains, we conducted a review of our major suppliers and to identify those which may be in high risk areas. We ask our existing and new suppliers to complete a self-assessment questionnaire detailing any action, procedures, policies and practices carried out by their organisation to prevent slavery and human trafficking. Suppliers must agree to adhere to the Code, a copy which is attached to the questionnaire and they are also required to annually certify a declaration form confirming understanding and compliance with the Code and the Act.

Any high risk suppliers will get a more detailed review of their questionnaires to identify areas of concern that may conflict with our Code or the Act, better understand the risk, provide feedback and agree steps to put in place to improve their processes. High risk suppliers that will receive special attention include companies that operate using temporary low skilled workers, operate outside the UK or EEA and/or manufacture or trade in raw materials outside the UK or EEA.

We will continually assess our compliance with the Act through the mechanisms of an annual audit carried out by our legal, procurement and internal audit teams.

VI. <u>Subsequent Measures</u> We will periodically review the effectiveness of our processes and systems. Any changes will be reflected in future annual statements.

This statement has been approved by the members of the limited liability company.

Dated: November 1, 2018

John Z. Shafai, Esq., CEO and General Counsel UVertz, LLC